

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: JONATHAN BENNETT : CHAPTER 13
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DEBTOR : BANKRUPTCY No. 18-15201

MOTION TO ABATE PAYMENTS AND MODIFY PLAN POST-CONFIRMATION

JONATHAN BENNETT, through his attorney, Zachary Perlick, Esquire, hereby moves for an Amendment of his Chapter 13 Plan Post-Confirmation, and sets forth in support thereof the following:

1. Debtor filed a voluntary Chapter 13 Petition on August 6, 2018; the Chapter 13 plan was confirmed on November 20, 2018.

2. Debtor lost income and fell behind in his payments to the trustee. Debtor has been ill and unable to make payments as a result of COVID-19. Debtor was ill and incurred medical bills.

3. Nationstar Mortgage, LLC, d/b/a Champion Mortgage Company filed a Motion for Relief on November 17, 2021. The Motion was settled and the parties agreed to enter into a stipulation. The stipulation requires the debtor to pay the post-petition arrears through his Chapter 13 Plan.

4. Debtor wishes to modify his confirmed plan in order to be consistent with the repayment terms to this secured creditor.

5. Debtor's confirmed plan required payments of \$630.00 each month for the remaining months of the plan (months 38 to 84). Debtor's modified Chapter 13 plan requires payments of \$726.60 each month for 44 months (months 41 to 84).

6. Debtor's modified plan extends the plan to 84 months. Debtor seeks additional time to complete the plan pursuant to the CARES Act.

Wherefore, Debtor requests that his Motion to Abate Plan Payments and Motion to Amend Plan Post-Confirmation be Granted.

Respectfully submitted,

/Zachary Perlick/
ZACHARY PERLICK, ESQUIRE
1420 Walnut Street, Suite 718
Philadelphia, PA 19102
(215) 569-2922